

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

| | | |
|---------------------------------|---|--------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | NO. 3:24-cr-00189 |
| v. |) | JUDGE CRENSHAW |
| |) | |
| DAVID AARON BLOYED |) | |

MOTION TO EXCLUDE JAIL CALL RECORDINGS

On April 21, 2025, the Government filed a proposed exhibit list. (D.E. 58) Proposed Exhibits 30-34 are jail calls numbered 1 through 5 (D.E. 58) The Government provided 12 jail call recordings in discovery. The Government has not informed defense counsel which recordings it intends to introduce.

The defense is not aware of anything in those recordings that is relevant or admissible in this trial. Mr. Bloyed speaks to his wife and various friends. He complains about his incarceration and his hopes for pretrial release, discusses his desire to buy land in Kentucky, expresses dissatisfaction with defense counsel and his desire to find alternative counsel, discusses his proposed trial strategy, and denies threatening anyone. None of the calls are relevant to whether Mr. Bloyed committed the charged offense. They are therefore inadmissible under Rule 402 of the Federal Rules of Evidence. Defense counsel will file a more detailed motion after the Government identifies which specific recordings it intends to introduce.

Respectfully submitted,

/s/ Will Allensworth

WILL ALLENSWORTH (BPR# 030735)

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CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2025, I electronically filed the foregoing Motion to Exclude Jail Call Recordings with the clerk of the court by using the CM/ECF system, which will send a notice of Electronic Filing to: Joshua Kurtzman and Philip Wehby, Assistant United States Attorneys, 719 Church Street, Suite 3300, Nashville, Tennessee 37203.

/s/ Will Allensworth

WILL ALLENSWORTH